

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	
	)	
Petition for Waiver of	)	
FCC Form 471 Filing Deadline	)	
	)	
InterMountain ESD filing on behalf of	)	CC Docket No. 02-6
Centennial School District, BEN 144920	)	
	)	
Schools and Libraries Universal Service	)	
Support Mechanism	)	

**Petition for Waiver of  
FCC Form 471 Filing Deadline for Funding Year 2017  
RE: FCC Form 471 No. 171010873**

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**I. INTRODUCTION AND SUMMARY**

The InterMountain ESD is an E-Rate consultant that processes and files E-Rate forms for over 80 school districts in Oregon, Washington & Idaho. Centennial School District is one of the school districts we provide E-Rate services to. This school district benefits a great deal from E-Rate funding, so it would be a huge loss to the district to not be awarded E-Rate funding.

On behalf of the Centennial School District, I attempted to submit and certify their Funding Year 2017 FCC Form 471, 171010873, in the E-Rate Productivity portal of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") website, on May 11, 2017 at 8:52 p.m. (PST), however, when I tried to submit the form, a message appeared that stated there were errors that needed to be fixed before I could go any further.

At no other time, did a notification or warning message pop up informing me that there were errors that needed to be fixed. I tried to figure out what was causing the error but was not able to determine the cause before the deadline time of 8:59 pm (PST). Later that evening, I went back into the form to try to figure out the error issue again and finally was able to determine that one of the entities in Centennial's entity list was not included in the Manage Recipients section—only 12 entities were showing but there should have been 13. Which confused me even more because the missing entity, Centennial Transition Center, was included on last year's Form 471, and was not a new entity that had just been added. I then had to go back into each FRN Line Item and reset the Manage Recipient list so that all 13 entities were included. One of the FRN's was a multi-line account with 16 sub accounts, so I had to go into each one of those sub accounts and fix the Manage Recipients error and then was finally able to submit and certify the form.

Having about 6 years of experience in this position, I will say this E-Rate funding year has definitely been the most frustrating. The fact that the system let me go all the way through the Form 471 until you get to the certification page is very misleading. Had I known prior to filing the form there were errors that had to be fixed before submission, I could have completed that task before the deadline day. In addition, the amount of time it took me to change the exact same thing on every FRN line item was very frustrating. It took me almost 30 min to fix all of those errors, when it is something that I should have been able to fix globally for all FRN line items.

Being the sole person responsible for filing the Form 471's for our customers, it is of utmost importance to me to make sure all forms are filed in a timely manner. So, with this being my first ever experience with filing a Form 471 "out of window", I am quite concerned that a school district could miss receiving much-needed E-Rate funds due to a flawed E-Rate filing system that does not seem to be proactive in assuring the success of applicants receiving E-Rate funding.

**II. Request**

The InterMountain ESD respectfully petitions the Commission to request a waiver of the Funding Year 2017 FCC Form 471 filing deadline on behalf of the Centennial School District to allow the Out of Window submission of their E-Rate Funding Year 2017 FCC Form 471 171010873, due to an issue in the EPC filing system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Casey Seeger', is written over a horizontal line.

Casey Seeger

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**Dated:** May 12, 2017